

Public Policy and External Affairs

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SC PUBLIC SERVICE  
COMMISSION

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**VIA HAND DELIVERY**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Docket No. 2005-347-C Comments Regarding the Commission's Proposed  
Changes to Article 6

Dear Mr. Terreni:


Verizon would like to thank the Commission Staff and the Office of Regulatory Staff for their participation in the workshops and joint meetings to address proposed changes to Article 6 to ensure compliance with Act. No. 175. On January 6, 2006, the Staff, ORS and interested parties from the industry participated in a workshop. While the Staff's proposal reflects many changes discussed during that workshop, Verizon recommends that the following sentence be added to Rule 103-612 (1):

"If a utility operating under S.C. Code Ann. 58-9-575, 58-9-576 or 58-9-585 files an annual report with the FCC, it may comply with this requirement by filing with the commission copies of the annual report(s) it submits to the FCC."

The Commission has acknowledged that companies operating under alternative regulation have different filing requirements from those companies operating under rate-of-return regulation, and require the filing of different reports for each. Allowing these alternative regulation companies to file the reports submitted to the FCC would avoid the preparation of duplicate reports by these companies and still provide the Commission and the ORS with the information they need.

Verizon respectfully requests that the Commission adopt this proposed change. If you have questions or concerns, please feel free to contact me at my office number, 803-254-5736.

With kind personal regards, I am



Stan J. Bugner

cc: Ms. Katie C. Morgan, Director of Telecommunications (ORS)